



## **TACFS Written Testimony to Texas House Human Services Committee September 2020**

**Interim Charge:** *Identify and make recommendations to remove barriers to successful implementation of Community-Based Care*

The Texas Alliance of Child and Family Services (TACFS) is an association of mission-driven community organizations providing the full continuum of care in the child welfare system. From prevention to foster care, to post-adoption and after-care services, community organization staff are on the front lines serving children, youth, and families across Texas.

Since the passage of Community Based Care (CBC) as part of SB 11 in 2017, TACFS has been actively involved in supporting regional preparation and implementation. We work to support the positive outcomes outlined in CBC through supporting both Single Source Continuum Care Contractors (SSCCs) and the network of mission driven organizations that support their communities as part of the SSCC network. We celebrate Texas' geographic and cultural diversity, and we also understand that means that care and services cannot be "one size fits all." CBC is community-led care and services with the goals to keep children safe, keep families together, keep children in their communities, provide children and youth an active voice in their care, and so much more. With the appropriate investment in resources and support from the state, we have seen progress in CBC areas and anticipate more to come as more catchment areas roll out and as current catchment areas progress.

In addition to supporting implementation of CBC areas, TACFS is active in three separate CBC readiness efforts across Texas. In these areas community leaders have joined together to identify gaps in services, identify strengths, and work to better understand the unique challenges and opportunities they face. These areas are bringing in the broader community and are beginning to move forward with strategies to address challenges, build on strengths, and continue to better understand and support the children and families they serve. With the State's clear direction codified in SB 11, communities are doing their part to prepare and that will yield improvements and better positioning of communities for success.

Serving children and families in foster care is complex, and the transition to CBC has been uniquely challenging to each of the current catchment areas. The challenges range from minute details such as obtaining badges to more pressing challenges such as immediately taking on high numbers of children without placements at the same time capacity for these youth in the legacy system is being lost.

In spite of these challenges, we've seen areas thrive and realize the opportunities of CBC, even during the COVID-19 pandemic. Child and youth serving organizations were on the frontlines, showing up every day for Texas' most vulnerable. SSCCs were able to quickly mobilize community resources and support their network -- setting up emergency funds for foster and kinship families that lost employment, procuring hand sanitizer from local distilleries, connecting with local churches to gather sanitation materials, working with doctors and hospitals to gather PPE and share the best available information to their networks.

And, through all of the challenges, CBC is continuing to demonstrate improved outcomes in many domains.

***TACFS supports the DFPS Community Based Care Implementation Plan to continue investment in the existing catchment areas, appropriately progressing stages and continue expansion into four new catchment areas, in***



*accordance with a sound funding methodology and with continuous quality improvement from the ongoing evaluations.*

#### **ISSUES AND RECOMMENDATIONS:**

1. The current method of financing for Community Based Care does not adapt the unique needs of each region and the children served. In order to incentivize the highest quality organizations to take on CBC, it is critical that the method of finance is clear, stable, and methodologically sound. ***TACFS supports an updated rate methodology that adjusts to the acuity of children served, and is reflective of the number of children served in order to maintain targeted caseload sizes.***
2. For many years, the state has invested in resources to update the state's IMPACT case management system. While limited improvements have been made over time and access is allowed for certain parties to a case, IMPACT is inoperable with other systems and is incompatible with CBC implementation. SSCCs have put into place forward-thinking case management technology that can be flexible over time and allows for improved information gathering. These systems allow organizations to track child-level data, placements, and system-wide data and analysis. While this is crucial to support their service network and appropriately understand and provide services, due to the duplicative efforts, this requires additional resources to support. In recent years, the federal government has established new guidance for the Comprehensive Child Welfare Information System (CCWIS), which would allow for improved interoperability while maintaining privacy. ***TACFS supports investment into interoperable case management technology, including but not limited to the Comprehensive Child Welfare Information System (CCWIS).***
3. SSCCs and their network organizations have multiple layers of regulation and processes through the oversight of DFPS Contracts, Investigations, HHSC Child Care Licensing, SSCCs, state auditors, ombudsmen, and court monitors. SSCCs have proactively worked together to align their processes and deadlines as much as possible, but organizational resources are increasingly being spent on documentation and compliance. Providers are more and more frustrated by the confusion in entities in and out of organizations and foster homes at times for the same reasons. ***TACFS supports efforts to align organizational oversight in a manner that provides transparency and accountability and allows CBC areas to incentivize the best providers. We urge DFPS and HHSC to capture provider time and costs associated with the growing number of oversight entities.***



4. Community Based Care, at its core, is intended to reflect the strengths, needs, challenges, and opportunities of each region. CBC works best when truly a local effort – utilizing local resources and partnering to meet needs. It is a intentional shift from a “one size fits all” approach that makes responding to the individual needs of each child and family difficult and limits innovation. Even in the early stages of implementation, it is critical that SSCCs and their networks are supported and reviewed in the context of their unique communities. CBC must continue to be reviewed in the context of communities:

- a. Implementation is not a light switch. SSCCs undertake the foster care system as-is. They take on regional specific challenges and the responsibility of existing placements and services. Regions must diligently address existing issues - but thoughtfully and in the best interest of children. There are many lessons learned in the implementation of Phase 1 and 2 in existing regions, and it is critical that this information is shared and used to help understand and support child serving organizations.

***TACFS supports information gathering and knowledge sharing to support future among SSCCs and DFPS in order to support future implementation efforts.***

- b. SB 11 set out the goals for CBC, including: keeping kids safe, keeping sibling groups together, supporting reunifications efforts and placements with family whenever possible, and keeping kids close to home. These goals were used to inform performance measures used to assess each region’s success. While existing CBC areas have broadly improved on statewide efforts, the metrics still do not tell the whole story. It is important to not just the CBC implementation but to our continued efforts to improve services for children and families that we work to better understand their needs.
  - i. CBC regions are able to collect and utilize data to more deeply understand issues and identify emerging trends. However, the existing performance measures for CBC use a statewide approach to address community-level issues. A more nuanced approach or additional context or data may provide a greater understanding of ongoing work of CBC, underlying issues, and successes.
  - ii. At times, the goals of CBC may contradict the best interest of individual children. For instance, a child may ask to live with a close grandparent out of their region rather than finding a foster home or even another kinship home that would keep them in their home school. As organizations called first and foremost to serve the health, safety, and wellbeing of children, this means certain choices may harm their metrics but are better for children.

***TACFS supports the continued evolution of CBC measurements to incorporate community-level data and additional information and context to appropriately assess outcomes.***

5. The recently published DFPS Family First Prevention Services Act (FFPSA) strategic plan outlines options for serving families at risk of having their children removed or “family preservation” services. The plan contemplates family preservation services being incorporated into CBC. TACFS acknowledges that both the State and SSCCs will need strong community based service providers equipped with evidence-based programming, trained and skilled staff, strong community relationships and method to finance true family preservation



services rather than the current Family Based Safety Services stage of CPS service. This stage is very limited on the service it provides and instead leans heavily on referrals to community programs that may or may not be available, regular CPS caseworker visits, and safety plans.

*TACFS supports further study of this option to grow prevention services capacity across the State. In addition, TACFS supports development of a detailed plan for incorporating family preservation into CBC that appropriately shares risk between the SSCC and the State, incentives up-front work with families, assesses resource needs for SSCCs and community based service providers, a sound financing methodology and performance measures jointly developed between the State, SSCCs and community service providers.*